

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 11-md-2262 (NRB)
THIS DOCUMENT RELATES TO:	
The OTC Action	No. 11-cv-5450

**OTC PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR ATTORNEYS' FEES
AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on October 25, 2018, at 11:00 a.m., at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, the OTC Plaintiffs will and hereby do move this Court, for the reasons set forth in their Memorandum of Law submitted herewith, for the following relief:

1. Class Counsel shall receive \$62,788,212 in attorneys' fees, to be paid *pro rata* out of the settlement fund created by the settlements between the OTC Plaintiffs and Deutsche Bank Aktiengesellschaft and HSBC Bank PLC (the "Deutsche Bank and HSBC Settlements").

2. Class Counsel shall be reimbursed \$604,256.89 in costs and expenses reasonably incurred in the prosecution and settlement of this litigation, to be paid out of the settlement fund created by the Deutsche Bank and HSBC Settlements.

3. Susman Godfrey L.L.P. and Hausfeld L.L.P. ("Class Counsel") shall have the sole authority to allocate and distribute any attorneys' fees and expenses awarded from the Deutsche Bank and HSBC Settlements pursuant to this order among counsel who performed work on

behalf of the OTC Plaintiffs in a manner which, in the opinion of Class Counsel, fairly compensates such counsel for their services.

This motion is supported by the OTC Plaintiffs' Memorandum of Law in Support of Motion for Attorneys' Fees and Reimbursement of Litigation Expenses and the Joint Declaration of William C. Carmody and Michael D. Hausfeld. A proposed order is submitted herewith.

Dated: August 24, 2018

/s/ Michael D. Hausfeld

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*Co-Lead Counsel for the OTC Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2018, I caused the aforementioned document to be served via the email or Electronic Case Filing (ECF) system in the United States District Court for the Southern District of New York, on all parties registered for CM/ECF in the above-captioned matters.

/s/ Michael C. Kelso

Michael C. Kelso